

July 24, 2020

VIA FIRST CLASS MAIL & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 5040 - Annual Environmental Report for Gas Service
For Period April 1, 2019 – March 31, 2020**

Dear Ms. Massaro:

Enclosed please find National Grid's¹ annual Environmental Report for Gas Service (Report) for the period April 1, 2019 through March 31, 2020, related to natural gas service in Rhode Island. This Report contains a description of the environmental remediation sites and the expenses incurred during the reporting period.

In accordance with the settlement of the 2012 Distribution Adjustment Charge proceeding in Docket No. 4339 and the Rhode Island Public Utilities Commission's Order No. 21005 (April 8, 2013) in that proceeding, the Company must include in its annual Environmental Report for Gas Service all asset sales or exchanges involving real property that the Company has acquired or may acquire that are funded by its customers through the Distribution Adjustment Clause. In addition, any future profits from the sale of land for which acquisition costs have been included in the Environmental Response Cost Factor in the Distribution Adjustment Clause must be credited to customers. For the reporting period, there were no such sales of real property.

¹The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

Luly E. Massaro, Commission Clerk
Docket 5040 – 2020 Annual Gas Environmental Report
July 24, 2020
Page 2 of 2

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3337.

Sincerely,



Leticia C. Pimentel

Enclosure

cc: Docket 5040 Service List
Leo Wold, Esq.
John Bell, Division
Al Mancini, Division

National Grid

**Environmental Report for
Gas Service**

**Period of
April 1, 2019 – March 31, 2020**

July 24, 2020

**Submitted to:
Rhode Island Public Utilities Commission**

Submitted by
nationalgrid

ENVIRONMENTAL REPORT

For Period
April 1, 2019 – March 31, 2020

A. 642 Allens Avenue, Providence, Rhode Island

This site is the former Sassafras Point Manufactured Gas Plant (MGP), which operated from 1910 until 1953. The site abuts the Providence River in a heavily industrialized area and is currently the location of The Narragansett Electric Company's (National Grid or the Company) central gas supply facility. The Phase 1 remediation project (addressing 4.5 acres) was completed in October 2002 and a Closure Report was filed with the Rhode Island Department of Environmental Management (RIDEM) in December 2002. A Site Investigation Report (SIR) addressing the remaining 37.5 acres of the site was submitted to RIDEM in April 2003. The Company anticipates submitting a SIR Addendum to RIDEM at a future date. The Company continues to perform semi-annual groundwater/non-aqueous phase liquid (NAPL) gauging, groundwater sampling and reporting to RIDEM, and maintenance of a boom in the Providence River. Consulting costs reported during this period also include those associated with Public Involvement Plan (PIP) support and environmental support for emergency utility repair. Contractor costs primarily included maintenance of the boom; support for emergency utility repair; groundwater/NAPL management support; and waste disposal.

		Bal @	Bal @	April 1-March 31
I. Environmental Expenses		04/01/2019	03/31/2020	Activity
907+908	642 Allens Ave	\$ 23,236,392	\$ 23,309,375	\$ 72,983
	Sub-Total	\$ 23,236,392	\$ 23,309,375	\$ 72,983

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$38,900
2	Construction/Disposal/Removal Costs	\$15,531
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$2,950
4	Property Purchases/Settlements/Legal	\$197
5	Other Costs (includes Company labor, materials & expenses)	\$15,405
	Total	\$72,983

ENVIRONMENTAL REPORT

For Period
April 1, 2019 – March 31, 2020

B. 170 Allens Avenue, Providence, Rhode Island

Citizens Gas Light began MGP operations at this site circa 1875. After Providence Gas Company (Providence Gas) acquired the plant in 1877, it was known as the South Station Plant. This former MGP operated until 1916. Subsequent to its use as a gas plant, this site was operated for over eighty years as a bulk fuel oil storage yard by a succession of companies, including Cargill, Inc. (Cargill). In November 1998, Providence Gas received a letter of responsibility from RIDEM relating to possible contamination. Cargill has also received a letter of responsibility from RIDEM for the site. An investigation was initiated to determine the extent of contamination, as well as the extent of the Company's responsibility. In September 2009, Cargill Petroleum, Rhode Island State Piers, LLC, and the Company received a Letter of Non-Compliance from RIDEM requiring that the parties complete certain activities at the site. The completion of the RIDEM-approved upland remedy for the site – which included the installation of a containment wall, excavation and off-site thermal treatment of certain impacted soils, and construction of an engineered cap (including installation of regulation-required integrated storm water treatment systems) – occurred in 2014. Activities performed during this reporting period were primarily associated with the operation, monitoring, and maintenance of the implemented upland remedy, including submittal of monthly progress reports to RIDEM. Costs incurred during the period also included legal-related matters associated with a third-party trespass.

		Bal @	Bal @	April 1-March 31
I. Environmental Expenses		04/01/2019	03/31/2020	Activity
379	170 Allens Ave.	\$ 8,279,581	\$ 8,347,988	\$ 68,407
	Sub-Total	\$ 8,279,581	\$ 8,347,988	\$ 68,407

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$58,880
2	Construction/Disposal/Removal Costs	\$1,123
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$4,375
4	Property Purchases/Settlements/Legal	\$4,029
5	Other Costs (includes Company labor, materials & expenses)	\$0
	Total	\$68,407

ENVIRONMENTAL REPORT

For Period
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Valley Resources Sites in Rhode Island

The Company's contribution action against Southern Union Company (Southern Union) relating to the remediation of the Mendon Road site in Attleboro, Massachusetts was dismissed following the sale of Southern Union's Rhode Island gas assets to the Company in August 2006. The suit, which alleged that Southern Union shared liability for the Mendon Road site, which was allegedly contaminated with coal gas manufacturing waste transported from a former MGP in Pawtucket, Rhode Island, was dismissed by the Company because the Purchase and Sale Agreement between the Company and Southern Union allocated to the Company the environmental liability for the Mendon Road site, the Tidewater MGP site in Pawtucket, and the Hamlet Avenue MGP site in Woonsocket.

As a further result of the allocation of environmental liability in the Purchase and Sale Agreement, the proceeds from the Company and Southern Union's \$6.129 million bankruptcy claim against the Stone and Webster entities, which had been held in an escrow account pending the resolution of the contribution dispute between the Company and Southern Union, were liquidated to the Company in January 2007 and have been applied to the Rhode Island gas and electric environmental response funds.

C. Mendon Road, MA

This project is associated with the Mendon Road remediation following discovery of MGP wastes at this location. No further work is anticipated on this project.

		Bal @		Bal @	April 1– March 31
I. Environmental Expenses		04/01/2019		03/31/2020	Activity
781	Mendon Rd, Cumberland	\$ 121,355		\$ 121,355	\$ 0
	Sub-Total	\$ 121,355		\$ 121,355	\$ 0

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$0
2	Construction/Disposal/Removal Costs	\$0
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$0
4	Property Purchases/Settlements/Legal	\$0
5	Other Costs (includes Company labor, materials & expenses)	\$0
	Total	\$0

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D. Pawtucket (Tidewater) MGP, Rhode Island

This project is associated with the site investigation and remediation activities at the former MGP and power plant site at this location. Following the Purchase and Sale Agreement between the Company and Southern Union, 80 percent of the costs associated with the site are assumed by electric operations of the Company, with the remaining 20 percent assumed by the gas operations of the Company.

The 28-acre site was the location of a former MGP that operated from the 1880s until 1954. In addition, the property housed a power plant that operated from the 1890s until 1976. The site currently houses gas and electrical operations, including a gas regulator station, an electrical substation, and two transmission towers. Site investigation activities have been performed at the site since 1986. Costs incurred during this reporting period are associated with preparation of an addendum to the Remedial Action Work Plan (RAWP) for the site, which was submitted to RIDEM in May 2019; environmental support for the community meeting to present the planned remedy for the site; implementation of additional investigation activities to further the design of the remedy; completion of the permitting for the remedy; initiation of the final design documents to support a bid event for the remediation; continued environmental support associated with the City of Pawtucket Master Plan redevelopment project, which includes the northern portion of the site; maintenance of publicly available sources of information regarding the Tidewater Environmental Project (including the National Grid Tidewater website and two bulletin boards near the site) pursuant to the RIDEM-approved Public Involvement Plan; annual groundwater monitoring and quarterly NAPL gauging and preparation of a report to document past sampling; bi-weekly site inspections; and preparation of bi-weekly and monthly status reports for submittal to RIDEM.

		Bal @		Bal @	April 1– March 31
I. Environmental Expenses		04/01/2019		03/31/2020	Activity
782	Tidewater St, Pawtucket	\$ 1,891,725		\$ 2,047,795	\$ 156,070
	Sub-Total	\$ 1,891,725		\$ 2,047,795	\$ 156,070

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$152,191
2	Construction/Disposal/Removal Costs	\$925
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$2,790
4	Property Purchases/Settlements/Legal	\$59
5	Other Costs (includes Company labor, materials & expenses)	\$105
	Total	\$156,070

ENVIRONMENTAL REPORT

For Period
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E. Woonsocket (Hamlet Ave.) MGP, Rhode Island

This project is associated with the site investigation and remediation activities at the former MGP site at this location. Following the Purchase and Sale Agreement between the Company and Southern Union, 80 percent of the costs associated with the former MGP site are assumed by electric operations of the Company, with the remaining 20 percent assumed by the gas operations of the Company.

The site was the location of a MGP, which operated from 1852 until approximately 1913. The gas regulator station was demolished in July 2015 and the site is currently vacant. Site visits were performed to provide environmental support during substation upgrade activities and replacement of a gas main. Both of these projects were completed in 2015. Investigations on the North Holder and substation areas of the site were completed and a Summary Letter was submitted to RIDEM on September 21, 2015. Based on the results of the investigations, the Company's environmental consultant recommended that RIDEM assign a new case number to the substation and substation access road areas, as MGP-related contaminants are not present in these areas. RIDEM assigned a new case number to the substation and access road areas in February 2016. Costs incurred during this reporting period are associated with, periodic site inspections, preparation for site stabilization activities, and groundwater monitoring.

		Bal @	Bal @	April 1-March 31
		04/01/2019	03/31/2020	Activity
I. Environmental Expenses				
783	Hamlet Ave, Woonsocket	\$ 203,819	\$ 213,517	\$ 9,698
	Sub-Total	\$ 203,819	\$ 213,517	\$ 9,698

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$5,428
2	Construction/Disposal/Removal Costs	\$157
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$0
4	Property Purchases/Settlements/Legal	\$7
5	Other Costs (includes Company labor, materials & expenses)	\$4,106
	Total	\$9,698

ENVIRONMENTAL REPORT

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F. PCB Regulated Pipe Abandonment, Rhode Island

In 1998, the U.S. Environmental Protection Agency (EPA) enacted a major change to regulations 40 CFR Parts 750 and 761 governing polychlorinated biphenyls (PCBs). These new regulations are commonly referred to as the “MegaRule.” Among other matters, the MegaRule addresses the testing, characterization, and disposal of PCB-contaminated pipe in natural gas distribution systems. This project tracks costs associated with the analytical testing of condensate and wipe test samples and disposal of PCB-contaminated condensate, drip water, and pipe. Project costs for the past three years were higher than those incurred in prior reporting years because of the accelerated replacement of gas services and mains to improve system reliability. Additional costs associated with the management of PCB-contaminated condensate in the distribution system were incurred starting in FY 2018, resulting in higher costs than previous years.

		Bal @		Bal @	April 1-March 31
I. Environmental Expenses		04/01/2019		03/31/2020	Activity
307	PCB Reg - Pipe Abandonment	\$ 2,334,140		\$ 2,710,993	\$ 376,853
	Sub-Total	\$ 2,334,140		\$ 2,710,993	\$ 376,853

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$55,229
2	Construction/Disposal/Removal Costs	\$317,671
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$0
4	Property Purchases/Settlements/Legal	\$0
5	Other Costs (includes Company labor, materials & expenses)	\$3,953
	Total	\$376,853

ENVIRONMENTAL REPORT

For Period
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G. 18 and 21 Holders at 642 Allens Avenue, Providence, Rhode Island

This project tracks environmental costs associated with the decommissioning of the No. 18 and No. 21 former gas holders and associated structures at this former MGP. The Former Gas Holders 18 and 21 were decommissioned during FY 2010. No future costs are anticipated with this project.

		Bal @		Bal @	April 1-March 31
I. Environmental Expenses		04/01/2019		03/31/2020	Activity
700	18 & 21 Holders Allens Av	\$ 2,776,743		\$ 2,776,743	\$ 0
	Sub-Total	\$ 2,776,743		\$ 2,776,743	\$ 0

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$0
2	Construction/Disposal/Removal Costs	\$0
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$0
4	Property Purchases/Settlements/Legal	\$0
5	Other Costs (includes Company labor, materials & expenses)	\$0
	Total	\$0

ENVIRONMENTAL REPORT

For Period
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H. 18 Canal Street, Westerly, Rhode Island – Mercury Spill

On December 9, 1996, approximately half an ounce of mercury was released to the site soils and RIDEM was notified. Remediation contractors conducted various remedial activities at the site to address the release, including the shipment of approximately 14 cubic yards of contaminated soil offsite for disposal. In a February 10, 1999 letter, RIDEM requested additional information and the Company submitted a response to RIDEM on December 22, 1999. The Company then submitted a letter to RIDEM on February 7, 2000 requesting No Further Action with regard to the mercury release. RIDEM has not yet responded. No future costs are anticipated with this project.

		Bal @		Bal @		April 1-March 31
I. Environmental Expenses		04/01/2019		03/31/2020		Activity
161	Mercury Spill Canal St Westerly	\$ 29,133		\$ 29,133		\$ 0
Sub-Total		\$ 29,133		\$ 29,133		\$ 0

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$0
2	Construction/Disposal/Removal Costs	\$0
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$0
4	Property Purchases/Settlements/Legal	\$0
5	Other Costs (includes Company labor, materials & expenses)	\$0
Total		\$0

ENVIRONMENTAL REPORT

For Period
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I. 18 Canal Street, Westerly, Rhode Island – MGP Site

This property is a former MGP that the Company operated at this location from 1885 to 1953. Southern Union owned this property prior to its acquisition by the Company. Future environmental costs associated with the former MGP will be assumed by electric operations of the Company.

		Bal @		Bal @	April 1-March 31
I. Environmental Expenses		04/01/2019		03/31/2020	Activity
144	Soil Invest Canal St Westerly	\$ 82,184		\$ 82,184	\$ 0
Sub-Total		\$ 82,184		\$ 82,184	\$ 0

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$0
2	Construction/Disposal/Removal Costs	\$0
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$0
4	Property Purchases/Settlements/Legal	\$0
5	Other Costs (includes Company labor, materials & expenses)	\$0
Total		\$0

ENVIRONMENTAL REPORT

For Period
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J. 9 JT Connell Highway, Newport, Rhode Island

This property is the Company's former Newport operations center. Low levels of environmental contamination were discovered during due diligence investigations related to a sale of the property. The Company no longer owns the property. Groundwater contamination necessitated continued groundwater monitoring and reporting.

All remedial actions are now complete and RIDEM issued a Letter of Compliance to the Company on January 13, 2005 indicating no further action is required. The groundwater monitoring wells were closed in July 2005 and no future costs are anticipated.

		Bal @		Bal @		April 1-March 31
I. Environmental Expenses		04/01/2019		03/31/2020		Activity
178	Site Inv. Connell Hwy Newport	\$ 44,092		\$ 44,092		\$ 0
	Sub-Total	\$ 44,092		\$ 44,092		\$ 0

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$0
2	Construction/Disposal/Removal Costs	\$0
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$0
4	Property Purchases/Settlements/Legal	\$0
5	Other Costs (includes Company labor, materials & expenses)	\$0
	Total	\$0

ENVIRONMENTAL REPORT

For Period
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K. Thames & Wellington, Newport, Rhode Island

On June 28, 2006, the Company received a Letter of Responsibility from RIDEM requesting a site investigation for this property. A MGP operated at this location from the early 1890s until approximately 1955. In the 1980s, the site was developed for mixed residential and commercial use with the construction of condominiums and commercial buildings. The Company has completed site investigation activities under the RIDEM regulations, as well as two significant RIDEM-approved Short-Term Response Actions (storm drain sealing/lining program and soil cap installation). A Remedial Action Evaluation Report was submitted to RIDEM for this site. Costs reported this period are for work associated with annual groundwater monitoring and reporting and preparation of monthly status reports to RIDEM regarding ongoing and proposed site activities. Contractor costs are for waste disposal associated with annual groundwater monitoring.

		Bal @	Bal @	April 1-March 31
I. Environmental Expenses		04/01/2019	03/31/2020	Activity
	Thames & Wellington Inv.	\$ 6,242,609	\$ 6,287,030	\$ 44,421
	Sub-Total	\$ 6,242,609	\$ 6,287,030	\$ 44,421

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$36,929
2	Construction/Disposal/Removal Costs	\$1,645
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$969
4	Property Purchases/Settlements/Legal	\$1,662
5	Other Costs (includes Company labor, materials & expenses)	\$3,216
	Total	\$44,421

ENVIRONMENTAL REPORT

For Period
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L. Mercury Seal Regulator Replacement Program, Rhode Island

This project is associated with the Company’s current mercury seal regulator (MSR) replacement program. This program has a proactive goal to remove all known MSRs from the distribution system. More than 9,000 MSRs have been replaced to date. The work is continuing and includes independent real-time vapor screening of all MSR locations prior to, during, and following MSR removal to document that all mercury has been properly contained. Activities during this reporting period include removal of three MSRs with three spill cleanups and no removal of impacted vent piping. The average cost per MSR removal during this 12-month period was \$1,092, which is similar to the FY 2019 average of \$1,352. The cost of the spill clean-up was \$49,569 and the cost of the impacted vent piping removal was \$0.

		Bal @	Bal @	April 1-March 31
I. Environmental Expenses		04/01/2019	03/31/2020	Activity
171	Mercury Regulator Replace Program	\$ 3,111,496	\$ 3,164,340	\$ 52,844
Sub-Total		\$ 3,111,496	\$ 3,164,340	\$ 52,844

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$22,504
2	Construction/Disposal/Removal Costs	\$21,083
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$0
4	Property Purchases/Settlements/Legal	\$0
5	Other Costs (includes Company labor, materials & expenses)	\$9,257
Total		\$52,844

ENVIRONMENTAL REPORT

For Period
April 1, 2019 – March 31, 2020

M. Miscellaneous MGP Program Costs, Rhode Island

Costs for this project are associated with general costs and Company project management costs for the gas operations MGP program.

		Bal @	Bal @	April 1-March 31
I. Environmental Expenses		04/01/2019	03/31/2020	Activity
	Miscellaneous MGP Program	\$ 513,476	\$ 574,055	\$ 60,579
	Sub-Total	\$ 513,476	\$ 574,055	\$ 60,579

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$19,609
2	Construction/Disposal/Removal Costs	\$0
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$0
4	Property Purchases/Settlements/Legal	\$1,536
5	Other Costs (includes Company labor, materials & expenses)	\$39,434
	Total	\$60,579

ENVIRONMENTAL REPORT

For Period
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N. Insurance Recovery Activities

Costs for this project are associated with insurance recovery claims for the investigation and remediation of Company sites.

		Bal @		Bal @	April 1-March 31
I. Environmental Expenses		04/01/2019		03/31/2020	Activity
	Insurance Recovery Activities	\$ 1,370,810		\$ 1,372,212	\$ 1,402
	Sub-Total	\$ 1,370,810		\$ 1,372,212	\$ 1,402

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$0
2	Construction/Disposal/Removal Costs	\$0
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$0
4	Property Purchases/Settlements/Legal	\$1,402
5	Other Costs (includes Company labor, materials & expenses)	\$0
	Total	\$1,402

ENVIRONMENTAL REPORT

For Period
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O. East Providence (First Ave) Holder

The parcel was purchased by Providence Gas in April 1872. The site is the location of two former remote gas holders (referred to as Holders 11 and 20). Available information indicates that gas holder 11 was destroyed during the Hurricane of 1938 and gas holder 20 was present until circa 1972. The property currently houses active natural gas lines and below-grade gas regulator stations. Costs incurred during this period are for quarterly site inspections for draft Environmental Land Usage Restriction (ELUR) compliance and annual ELUR reporting to RIDEM.

		Bal @	Bal @	April 1-March 31
I. Environmental Expenses		04/01/2019	03/31/2020	Activity
	East Providence (First Ave) Holder	\$ 372,957	\$ 379,425	\$ 6,468
	Sub-Total	\$ 372,957	\$ 379,425	\$ 6,468

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$4,023
2	Construction/Disposal/Removal Costs	\$0
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$89
4	Property Purchases/Settlements/Legal	\$0
5	Other Costs (includes Company labor, materials & expenses)	\$2,356
	Total	\$6,468

ENVIRONMENTAL REPORT

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P. 560 Thames Street, Newport, RI

Based on a review of Sanborn Maps, this MGP was in operation by 1870, and was first listed as the Newport Gas Company in 1876 and then Newport Gas Light Company in 1893. The site appears to have become operational sometime between 1850 and 1870. This MGP pre-dated the MGP located at 551 Thames Street. In March 2016, National Grid was contacted by RIDEM regarding this site, as apparent MGP waste was identified during the reconstruction of the gasoline service station located on the northwestern portion of the former MGP. Costs incurred during this reporting period are for researching and responding to questions from RIDEM.

		Bal @	Bal @	April 1-March 31
I. Environmental Expenses		04/01/2019	03/31/2020	Activity
	560 Thames Street, Newport, RI	\$ 164,201	\$ 165,403	\$ 1,202
	Sub-Total	\$ 164,201	\$ 165,403	\$ 1,202

Cost Breakdown by Category		Payments During this Period
1	Consulting Costs	\$0
2	Construction/Disposal/Removal Costs	\$0
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$177
4	Property Purchases/Settlements/Legal	\$815
5	Other Costs (includes Company labor, materials & expenses)	\$210
	Total	\$1,202

ENVIRONMENTAL REPORT
For Period
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SUMMARY OF FISCAL YEAR 2020 COSTS

Summary of Costs for All Sites			
		Payments During this Period	Payments to date
1	Consulting Costs	\$393,693	
2	Construction/Disposal/Removal Costs	\$358,135	
3	Regulatory Oversight Costs (RIDEM/EPA/NBC)	\$11,350	
4	Property Purchases/Settlements/Legal	\$9,707	
5	Other Costs (includes Company labor, materials & expenses)	\$78,042	
	Total	\$850,927	
		Payments During this period	Payments to date
A.	642 Allens Avenue, Providence, Rhode Island	\$72,983	\$23,309,375
B.	170 Allens Avenue, Providence, Rhode Island	\$68,407	\$8,347,988
C.	Mendon Road, MA	\$0	\$121,355
D.	Pawtucket (Tidewater) MGP, Rhode Island	\$156,070	\$2,047,795
E.	Woonsocket (Hamlet Ave.) MGP, Rhode Island	\$9,698	\$213,517
F.	PCB Regulated Pipe Abandonment, Rhode Island	\$376,853	\$2,710,993
G.	18 & 21 Holders at 642 Allens Avenue, Providence, RI	\$0	\$2,776,743
H.	18 Canal Street Mercury Spill, Westerly, Rhode Island	\$0	\$29,133
I.	18 Canal Street, Westerly, Rhode Island	\$0	\$82,184
J.	9 JT Connell Highway, Newport, Rhode Island	\$0	\$44,092
K.	Thames & Wellington, Newport, Rhode Island	\$44,421	\$6,287,030
L.	Mercury Seal Regulator Replacement Program, RI	\$52,844	\$3,164,340
M.	Miscellaneous MGP, Rhode Island	\$60,579	\$574,055
N.	Insurance Litigation Haz Waste	\$1,402	\$1,372,212
O.	East Providence (First Ave) Holder	\$6,468	\$379,425
P.	560 Thames Street, Newport, RI	\$1,202	\$165,403
	Total	\$850,927	\$51,625,640

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Consulting Costs			
Site	Consultant Name	Purpose of Consultant Costs	Costs
642 Allens Ave, Providence, RI	GZA GeoEnvironmental, Inc.	Groundwater/NAPL monitoring and reporting; boom maintenance; environmental support for emergency utility repair; monthly inspections; Public Involvement Plan support	\$38,900
170 Allens Ave, Providence, RI	GZA GeoEnvironmental, Inc. EECS, Inc.	Upland remedy monitoring and reporting Project management activities	\$53,760 \$5,120
Pawtucket (Tidewater) MGP, RI	GZA GeoEnvironmental, Inc. EECS, Inc.	Public involvement activities; completion and submittal of RAWP to RIDEM; design investigation activities; groundwater/NAPL monitoring and reporting Project management activities	\$135,835 \$16,356
Hamlet Ave (Woonsocket) MGP	GZA GeoEnvironmental, Inc. Coneco Engineers & Scientists, Inc.	Groundwater sampling, planning for site stabilization activities, and periodic site inspections Health & safety monitoring	\$4,658 \$770
PCB Pipe Regulators	Coneco Engineers & Scientists, Inc.	Health & safety monitoring	\$55,229
Thames & Wellington, Newport	GZA GeoEnvironmental, Inc.	Annual ground water/NAPL monitoring and reporting	\$36,929
Mercury Seal Regulators	Coneco Engineers & Scientists, Inc. GZA GeoEnvironmental, Inc.	RIDEM reporting; spill cleanup oversight, documentation, air monitoring, and clearance sampling Support for oversight and reporting	\$22,371 \$133
Miscellaneous MGP, RI	GZA GeoEnvironmental, Inc.	Support for remote holder sites	\$19,609
East Providence Holder	GZA GeoEnvironmental, Inc.	Site inspections; reporting	\$4,023

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Contractor/Disposal			
Site	Contractor Name	Task	Costs
642 Allens Ave, Providence, RI	Clean Harbors Environmental Services, Inc.	Waste disposal, support for sheen mitigation/boom maintenance; support for emergency utility repair; groundwater/NAPL management support	\$15,531
170 Allens Ave, Providence, RI	Clean Harbors Environmental Services, Inc.	Waste disposal, support for sheen mitigation/boom maintenance	\$1,123
Pawtucket (Tidewater) MGP, RI	Clean Harbors Environmental Services, Inc.	Waste disposal; miscellaneous support for utility investigations	\$133
	Stanley Tree Service	Invasive species management	\$792
Hamlet Ave (Woonsocket) MGP	Clean Harbors Environmental Services, Inc.	Waste disposal	\$157
PCB Regulated Pipe Abandonment	Clean Harbors Environmental Services, Inc.	Pipe removal and disposal; management and disposal of PCB-contaminated liquids	\$317,671
Thames & Wellington, Newport	Clean Harbors Environmental Services, Inc.	Waste disposal	\$1,645
Mercury Seal Regulator (MSR) Replacement Program	Clean Harbors Environmental Services, Inc.	MSR and impacted vent piping removal	\$21,083